

LOWELL DECL. EX. 25

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SHABTAI SCOTT SHATSKY, *et al.*,

Plaintiffs,

v.

Civ. No. 18-12355-MKV

THE PALESTINE LIBERATION
ORGANIZATION, *et al.*,

Defendants.

DECLARATION OF NIMROD GUEZ

I, the undersigned, Nimrod Guez, hereby declare as follows:

A. Personal and Professional Background

1. I was born in Israel in 1970, and served in the Israeli military between 1988 and 1992.
2. In 1992, I joined the Israel Security Agency (“ISA”).¹ The ISA is the Israeli government agency that is responsible for and tasked with carrying out counterterrorism, counter-espionage, and intelligence-gathering activities in Israel, the West Bank and the Gaza Strip.
3. Between 1992 and 2008, I served in a wide variety of classified positions in the ISA dealing with Palestinian terrorist activities in the West Bank, Gaza Strip and Israel.
4. Between 2008 and 2011, I served as the Head of the ISA’s Intelligence Integration Department.
5. Between 2011 and 2013, I served as the Head of the ISA Intelligence School.
6. Between 2014 and 2017, I served as the Head of an Operational Division in the ISA, with a civilian rank equivalent to that of Brigadier-General.
7. I retired from the ISA in 2017, after 25 years of service.

¹ The ISA is also known by the Hebrew initials or acronym “Shin Bet” or the “Shabak.” I prefer to use “Israel Security Agency,” since that is the official term in English.

8. I have a B.A. in Political Science from Bar Ilan University (1999), and an M.A. in Political Science from Haifa University (2012).

9. I speak and read Hebrew, Arabic and English.

B. The 2007 ISA Report

11. I have carefully examined the statements contained in the declaration given by the late Itzhak Ilan on September 14, 2020, which is attached hereto as Exhibit 2 ("Ilan Declaration"), concerning the 2007 ISA Report, and hereby confirm, based on my personal knowledge acquired during my service in the ISA, that all the statements contained in paragraphs 9-15 of the Ilan Declaration are entirely true and fully accurate. I hereby incorporate those statements into this declaration in full, and adopt them as my own.

12. Further to the statements contained in paragraph 12 of the Ilan Declaration, I would add that the ISA takes extreme care to ensure that its reports (such as the 2007 ISA Report), are accurate. In preparing ISA reports, ISA personnel use professional methods and analysis at every stage to screen the information to ensure that the reports contain only facts (and not assumptions). Professionalism, accuracy and the importance of challenging preconceptions are top organizational values within the ISA, and those values guide ISA personnel when they prepare ISA reports.

13. My statements herein are based on my personal knowledge and experience.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 19, 2021.

Nimrod Guez